

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

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|---------------------------------|---|----------------------|
| In Re: Arrest Warrant for |) | |
| Rayan Sharaf |) | |
| a/k/a "Feras Ghousheh" |) | Case No. 1:23-MJ-117 |
| |) | |
| |) | |
| Federal Bureau of Investigation |) | |
| Washington Field Office |) | |

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND APPLICATION FOR
ARREST WARRANT FOR RAYAN SHARAF.

I, Jeffrey L. Schurott, Special Agent, Federal Bureau of Investigation ("FBI"),
Washington Field Office ("WFO"), Washington, D.C., being duly sworn, do declare and
state:

BACKGROUND OF AFFIANT

1. I am a Special Agent with the FBI and have been so employed since
September 2017. After graduating from the FBI Academy at Quantico, Virginia, I was
assigned to the Washington Field Office of the FBI where I investigate a variety of criminal
matters including, but not limited to, corporate fraud, complex financial crimes, and other
white-collar crimes. Through my employment with the FBI, I have gained knowledge in
the use of various investigative techniques including the utilization of physical
surveillance, investigative interviews, financial investigations, the service of Grand Jury
Subpoenas, and the execution of search and arrest warrants. As a federal agent, I am
authorized to investigate violations of laws of the United States, and as a law enforcement
officer, I am authorized to execute warrants issued under the authority of the United States.

PURPOSE OF AFFIDAVIT

2. This affidavit is submitted in support of a criminal complaint and an application for the issuance of an arrest warrant for RAYAN SHARAF, also known as FERAS GHOSHEH (hereinafter “SHARAF”)¹, a Middle-Eastern male born in 1968. I am familiar with the facts set forth in this affidavit based upon my participation in this investigation, information obtained from victim interviews, and my review of records, documents, and other evidence obtained during the course of the investigation. Because this affidavit is being submitted for the limited purpose of setting forth probable cause, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to charge SHARAF with wire fraud, in violation of Title 18, United States Code, Section 1343.

OVERVIEW

3. As further described below, from on or about September 2021 to on or about July 2022, SHARAF executed a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises. The scheme, which involved defrauding cryptocurrency exchanges and/or banks, had four steps. First, SHARAF would move funds from a bank account to a trading account. Second, SHARAF engaged in a series of transactions involving cryptocurrency or fiat money within the trading account. Third, SHARAF would move the assets from the trading platform to a different account or cryptocurrency wallet from the first step. Finally, SHARAF would claim the original transaction from the bank to the trading platform was unauthorized, thus receiving a refund from the bank. As a result, SHARAF withdrew approximately \$180,000

¹ Based on my review of United States passport records for passport numbers [REDACTED] and [REDACTED], SHARAF and FERAS GHOSHEH appear to be the same individual.

combined from TradeStation and Coinbase, while falsely claiming to the funding financial institutions that the initial deposits and purchases into TradeStation and Coinbase were unauthorized, committing violations of Title 18, United States Code, Section 1343 (Wire Fraud).

TRADESTATION

4. TradeStation Securities, Inc. (“TradeStation”) is an SEC-registered, self-directed online broker-dealer and a futures commission merchant registered with the Commodity Futures Trading Commission. TradeStation also offers self-directed investors and traders online cryptocurrency brokerage services through its subsidiary TradeStation Crypto, Inc. TradeStation is located at 8050 SW 10th Street, Plantation, Florida 33324.

5. I have conducted a criminal investigation on behalf of the FBI that has developed evidence showing that, from May 2022 through June 2022, SHARAF completed six deposits from his Citibank account to his TradeStation account, totaling approximately \$79,000. During the same timeframe, SHARAF completed five transactions withdrawing approximately 43 Ethereum from his TradeStation account to wallet address 0xc186f6c4d946b7ac2b1ac35261016fd208e8327b registered to Family Member 1,² valued at approximately \$76,000 at the time of withdrawal. After the five transactions where SHARAF withdrew 43 Ethereum, TradeStation received notice from Citibank that three of the deposits into SHARAF’s TradeStation account were being recalled as unauthorized deposits.

6. My review of the Citibank account opening documents revealed that on or about April 20, 2022, SHARAF opened two Citibank checking accounts under the name

² Family Member 1 is known to your affiant, however, her name is removed to protect the integrity of the investigation.

Rayan B Sharaf: account ending in 4509 (hereinafter “Citi 4509”) and account ending in 4517 (hereinafter “Citi 4517”). SHARAF was the sole signer on both the Citi 4509 account and the Citi 4517 account.

7. My review of the TradeStation account opening documents revealed that on or about May 21, 2022, SHARAF opened TradeStation account ending in 5007 (hereinafter “TradeStation 5007”) under the name Rayan Sharaf. SHARAF was the only individual listed on the account. SHARAF opened the TradeStation 5007 account under Social Security Number (“SSN”) ending in 3137.

8. I reviewed the phone call audio recordings between SHARAF and TradeStation representatives. According to a law enforcement referral received from TradeStation, on or about May 25, 2022, SHARAF called the TradeStation Fraud Prevention department to complete the enhanced identity verification required for cryptocurrency transfers. To complete the enhanced identity verification process, SHARAF submitted a photograph of himself and a photograph of a Virginia driver’s license under the name “Rayan B Sharaf.”

9. My review of the Citi 4509 account statements and TradeStation 5007 account records revealed that SHARAF received \$50,000 from Family Member 1 and initiated three separate ACH deposits of \$50 each to the TradeStation 5007 account, which were posted³ to the Citi 4509 account in May 2022:

- a. A May 2022 Incoming Wire Transfer for \$25,000, bearing the description “WIRE FROM [Family Member 1]”;

³ A posted banking transaction is a transaction that has been fully processed and completed.

- b. Another May 2022 Incoming Wire Transfer for \$25,000, bearing the description “WIRE FROM [Family Member 1]”;
- c. A May 2022 ACH Electronic Debit for \$50, bearing the description “TRADESTATION PAYMENTS”;
- d. Another May 2022 ACH Electronic Debit for \$50, bearing the description “TRADESTATION PAYMENTS”;
- e. Another May 2022 ACH Electronic Debit for \$50, bearing the description “TRADESTATION PAYMENTS”.

10. SHARAF initiated one ACH deposit for \$25,000 to the TradeStation 5007 account, which was also posted to the Citi 4509 account in May 2022:

- a. A May 2022 ACH Electronic Debit for \$25,000, bearing the description “TRADESTATION PAYMENTS”.

11. My review of the Citi 4509 account statements and TradeStation 5007 account records revealed that SHARAF initiated three additional ACH deposits for \$25,000 each to the TradeStation 5007 account. One of the transactions was posted to the Citi 4509 account in May 2022, and two of the attempted transactions were declined:

- a. A May 2022 ACH Electronic Debit for \$25,000, bearing the description “TRADESTATION PAYMENTS”.

12. SHARAF initiated one ACH deposit for \$29,000 to the TradeStation 5007 account, which was posted to the Citi 4509 account in May 2022:

- a. A May 2022 ACH Electronic Debit for \$29,000, bearing the description “TRADESTATION PAYMENTS”.

13. Based on my review of phone call audio recordings between SHARAF and TradeStation representatives, in May 2022, SHARAF called a TradeStation representative to inquire why two deposits he attempted to initiate in May 2022 were declined. During the phone conversation, SHARAF confirmed he authorized and attempted three separate ACH deposits to the TradeStation 5007 account, each for \$25,000. The following is an excerpt from this recording between SHARAF and a TradeStation representative:

TradeStation Representative: You said you authorized an ACH deposit, correct?

Can you tell me the dollar amount and the financial institution?

SHARAF: *What is it again? Can you repeat what you said?*

TradeStation Representative: Yes sir, you said you authorized an ACH deposit.

SHARAF: *Yes.*

TradeStation Representative: Could you verify for me the dollar amount and the financial?

SHARAF: *\$25,000 for Citibank. And it was returned twice. And the Citibank account number ends with, uh, 4509... There were three of them that I've done today, two were declined and I just did another one a few minutes ago.*

TradeStation Representative: Yes sir, I see one at, um, now granted this time may be different, but this says it was at 2:47pm (unintelligible).

SHARAF: *Yes, that's the one.*

14. Based on my review of phone call audio recordings between SHARAF and TradeStation representatives, in May 2022, SHARAF again called a TradeStation representative to inquire when he would have access to his funds in full for all three “big” deposits that he made into the TradeStation 5007 account. During the phone call, SHARAF confirmed that he made two more large deposits for \$25,000 and \$29,000. The following is an excerpt from this recording between SHARAF and a TradeStation representative:

TradeStation Representative: So, you made a lot of deposits, alright, on the 23rd you made three deposits, sorry, four. Three for \$50, so \$150. Then you made another \$25,000 deposit, all of those were completed...Now you made two more deposits, these were declined, however.

SHARAF: *Right.*

TradeStation Representative: Then you made two more deposits, \$25,000 and \$29,000.

SHARAF: *Correct.*

TradeStation Representative: Correct? Okay.

15. My review of TradeStation 5007 account records revealed that between May 2022 and June 2022, SHARAF completed eight purchases of Ethereum with the TradeStation 5007 account, totaling at least \$100,000. Simultaneously, SHARAF completed three Ethereum sales with the TradeStation 5007 account, totaling approximately \$25,000.

16. TradeStation 5007 account statements and records also showed that in June 2022, SHARAF completed five withdrawals from the TradeStation 5007 account, totaling

43 Ethereum worth more than \$76,000 at the time of withdrawal, to wallet address 0xc186f6c4d946b7ac2b1ac35261016fd208e8327b:

- a. A June 2022 withdrawal of one Ethereum;
- b. A different June 2022 withdrawal of 13 Ethereum;
- c. A different June 2022 withdrawal of 12 Ethereum;
- d. A different June 2022 withdrawal of 15 Ethereum;
- e. A different June 2022 withdrawal of two Ethereum.

17. Based on my review of Binance.US account records, wallet address 0xc186f6c4d946b7ac2b1ac35261016fd208e8327b is held by Binance.US under account 56383772. Binance.US account 56383772 is registered to Family Member 1 and was created in May 2021.

18. In a phone call audio recording from June 2022, SHARAF told a TradeStation representative that Family Member 1 is his daughter.

19. Based on my review of Citibank communication records, in June 2022, SHARAF submitted a dispute to Citibank regarding the following three ACH debits from the Citi 4509 account:

- a. An ACH Debit to TradeStation in May 2022 for \$25,000;
- b. Another ACH Debit to TradeStation in May 2022 for \$25,000;
- c. Another ACH Debit to TradeStation in May 2022 for \$29,000.

As part of the dispute, SHARAF acknowledged that although TradeStation is a known entity to SHARAF, SHARAF did not authorize the three specific transactions above to be debited from his Citibank account. In June 2022, Citibank provided a response to

SHARAF's dispute, issuing a permanent credit in the amount of \$79,000 to the Citi 4509 account. The \$79,000 credit posted to the Citi 4509 account in June 2022.

20. My review of TradeStation 5007 account statements and a law enforcement referral received from TradeStation revealed that in June 2022, TradeStation received notification from Citibank that the three deposits noted above were being recalled due to unauthorized debit to consumer account:

- a. A June 2022 Funds Withdrawal for \$29,000, bearing the description "ACH DEP 5/27 RTN 6/16";
- b. Another June 2022 Funds Withdrawal for \$25,000, bearing the description "ACH DEP 5/23 RTN 6/16";
- c. Another June 2022 Funds Withdrawal for \$25,000, bearing the description "ACH DEP 5/26 RTN 6/16".

21. Based on my review of TradeStation accounting records, in September 2022, the TradeStation 5007 account recognized a loss of approximately \$80,000 to TradeStation.

22. According to Citibank account statements, in June 2022, SHARAF transferred \$79,000 from the Citi 4509 account to the Citi 4517 account. Simultaneously, SHARAF initiated one ACH payment totaling approximately \$27,000 from the Citi 4517 account to American Express. Also in June 2022, SHARAF initiated one domestic wire transfer totaling \$25,000 from the Citi 4517 account to Yasini of VA Corp., Inc. Open-source research identified Yasini Jewelers located in Falls Church, Virginia.

23. My review of Citibank account statements revealed that in April 2022, SHARAF withdrew approximately \$80,000 in cash from the Citi 4517 account.

24. My review of Citibank statements also revealed that in June 2022, SHARAF withdrew approximately \$1,000 in cash from the Citi 4517 account.

25. The final account activity for both the Citi 4509 account and the Citi 4517 account occurred on or about June 22, 2022, with SHARAF withdrawing all remaining funds in each account.

COINBASE

26. Coinbase is an American publicly traded money services business that allows its customers to buy, sell, and transfer cryptocurrencies via a secure online platform.

27. Based on my investigation, I know that from November 2021 through January 2022, SHARAF completed at least 13 purchases of cryptocurrency using his Coinbase account with funds originating from his PNC Bank and Truist Bank accounts, totaling more than \$56,000. SHARAF also completed four deposit transactions into his Coinbase account with funds originating from his Truist Bank account, totaling \$60,000. During the same timeframe, SHARAF completed five withdrawal transactions from his Coinbase account to his Truist Bank and Wells Fargo Bank accounts, totaling more than \$100,000. After the five transactions in which SHARAF withdrew more than \$100,000, Coinbase received notice from PNC Bank and Truist Bank that 13 purchases of cryptocurrency and four deposit transactions into SHARAF's Coinbase account were being recalled as unauthorized deposits.

28. Based on my review of PNC Bank account opening documents, in September 2021, SHARAF opened PNC Bank account ending in 1045 (hereinafter "PNC 1045") under the name Rayan B Sharaf. SHARAF was the sole signer on the PNC 1045 account. SHARAF opened the PNC 1045 account under SSN ending in 3137.

29. My review of Truist Bank account opening documents revealed that SHARAF opened two Truist Bank accounts under the name Rayan B Sharaf in September 2021: account ending in 7027 (hereinafter “Truist 7027”) and account ending in 9017 (hereinafter “Truist 9017”). SHARAF was the sole signer on both the Truist 7027 and Truist 9017 accounts. SHARAF opened both Truist Bank accounts under SSN ending in 3137.

30. Based on my review of Wells Fargo account opening documents, on or about December 9, 2021, SHARAF opened Wells Fargo account ending in 1977 (hereinafter “Wells Fargo 1977”) under the name Rayan B Sharaf. SHARAF was the sole signer on the Wells Fargo 1977 account. SHARAF opened the Wells Fargo 1977 account under SSN ending in 3137.

31. Coinbase account records show that on or about November 9, 2021, SHARAF created Coinbase account ending in C357 (hereinafter “Coinbase C357”) under the name Rayan Sharaf. SHARAF was the only individual listed on the account. SHARAF opened the Coinbase C357 account under SSN ending in 3137.

32. Based on my review of Coinbase account opening documents, as part of the Coinbase account opening process, SHARAF submitted a photograph of the front and back of a United States Passport Card to Coinbase with a listed name of Rayan B Sharaf.

33. My review of PNC Bank account statements and Coinbase account records revealed that during November 2021, SHARAF initiated multiple purchases of cryptocurrency, totaling more than \$26,000, in the Coinbase C357 account with funds

originating from the PNC 1045 account.⁴ These transactions were posted to the PNC 1045 account as web payments to Coinbase.com in November 2021.

34. Based on my review of Truist Bank account statements and Coinbase account records, in December 2021, SHARAF initiated two purchases of cryptocurrency, totaling approximately \$30,000, in the Coinbase C357 account with funds originating from the Truist 7027 account.

35. Based on my review of Truist Bank account statements and Coinbase account records, in December 2021, SHARAF initiated four deposits of \$15,000, totaling \$60,000, into the Coinbase C357 account with funds originating from the Truist 7027 account.

36. My review of Truist Bank account statements and Coinbase account records revealed that in December 2021, SHARAF completed four withdrawal transactions from the Coinbase C357 account to the Truist 9017 account, totaling more than \$59,000.

37. My review of Wells Fargo account statements and Coinbase account records revealed that in December 2021, SHARAF withdrew approximately \$48,000 from the Coinbase C357 account to the Wells Fargo 1977 account. The withdrawal from the Coinbase C357 account was posted to the Wells Fargo 1977 account in December 2021 for \$47,979.

38. According to Wells Fargo account records, in December 2021, SHARAF made two in-branch withdrawals from the Wells Fargo 1977 account for \$10,000 and \$20,000. Also in December 2021, SHARAF initiated two outgoing wire transfers from the Wells Fargo 1977 account. The first \$5,000 wire transfer was sent to a PNC Bank account

⁴ Coinbase has a feature that allows the user to link their bank account to their Coinbase account and use their bank account to purchase cryptocurrency directly within Coinbase.

registered to Feras Ghouseh. The second \$5,000 wire transfer was sent to a PNC Bank account registered to [REDACTED]

39. Based on my review of PNC Bank phone recordings, in December 2021, SHARAF initiated a dispute with PNC Bank regarding 12 purchases of cryptocurrency withdrawn to Coinbase.com with funds that originated from the PNC 1045 account. SHARAF disputed each of the 12 transactions individually with the PNC Bank representative. SHARAF attested that he did not authorize any of the 12 withdrawal transactions to Coinbase.com.

40. My review of PNC Bank account statements revealed that PNC Bank issued refund credits to the PNC 1045 account in December 2021 for 11 of the 12 withdrawal transactions to Coinbase.com, totaling approximately \$26,000.

41. PNC Bank account statements further revealed that in December 2021, SHARAF initiated two outgoing domestic wire transfers from the PNC 1045 account totaling more than \$25,000. SHARAF sent an approximately \$2,200 wire transfer to a PNC Bank account, recipient [REDACTED] SHARAF sent an approximately \$23,000 wire transfer to the Wells Fargo 1977 account, recipient Rayan Sharaf.

42. Based on my review of Truist Bank account statements and dispute records, on or about December 28, 2021, SHARAF attested to Truist Bank that he did not authorize the two purchases of cryptocurrency or the four deposits of \$15,000 into the Coinbase C357 account with funds originating from the Truist 7027 account. Truist Bank issued six credits of \$15,000 to the Truist 7027 account in December 2021, totaling \$90,000.

43. According to Truist Bank wire details, on or about January 3, 2022, SHARAF initiated one \$78,000 wire transfer to the Wells Fargo 1977 account from the Truist 7027 account.

44. According to Truist Bank account statements, in December 2021, SHARAF withdrew cash from the Truist 7027 account totaling approximately \$1,000.

45. I have reviewed information provided by TradeStation that shows TradeStation servers are located outside of Virginia.

46. I have reviewed information provided by multiple parties showing that an IP address associated with a family member of SHARAF and registered to an address in Centreville, Virginia, which is in the Eastern District of Virginia, accessed the TradeStation servers located outside the Commonwealth of Virginia.

CONCLUSION

Based on the foregoing, your affiant believes there is probable cause to believe that between November 2021 and June 2022, SHARAF withdrew approximately \$180,000 combined from TradeStation and Coinbase, while claiming to the funding financial institutions that the initial deposits and purchases into TradeStation and Coinbase were unauthorized, committing violations of Title 18, United States Code, Section 1343 (Wire Fraud).

Respectfully submitted,



Jeffrey L. Schurott, Special Agent
Federal Bureau of Investigation

Attested to in accordance with the requirements of
Fed. R. Crim. P. 4.1 via telephone on June 6, 2023.

**John F.
Anderson**

Digitally signed by John F.
Anderson
Date: 2023.06.07 13:06:35
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The Honorable John F. Anderson
United States Magistrate Judge

Alexandria, Virginia